

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

FILED

3:33 pm, Sep 30, 2022

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
Roger A.G. Sharpe, Clerk

UNITED STATES OF AMERICA,

Plaintiff,

V.

KENNETH MORGAN ADDISON,
a/k/a "Moe,"

Defendant.

CAUSE NO.

1:22-cr-142-JMS-DLP

-01

INFORMATION

The UNITED STATES ATTORNEY charges that:

COUNT 1

FELON IN POSSESSION OF A FIREARM
18 U.S.C. § 922(g)(1)

On or about March 5, 2020, in Madison County, Indiana, within the Southern District of Indiana, defendant KENNETH MORGAN ADDISON, after having been convicted of a offense punishable by more than one year in prison, did knowingly possess, in or affecting interstate commerce, a firearm, to wit, a Glock pistol. Further, KENNETH MORGAN ADDISON, did know that he was a convicted felon on March 5, 2020.

All in violation of Title 18, United States Code, Section 922(g)(1).

COUNT 2

POSSESSION WITH THE INTENT TO DISTRIBUTE MARIJUANA
21 U.S.C. § 841(a)

On or about March 5, 2020, in Madison County, Indiana, within the Southern District of Indiana, defendant KENNETH MORGAN ADDISON, did knowingly and intentionally possess

with the intent to distribute less than 50 kilograms of marijuana, a schedule I controlled substance.

All in violation of Title 21, United States Code, Section 841(a)(1) & (b)(1)(D).

FORFEITURE

1. The allegations contained in Count 1 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c).

Upon conviction of the offense[s] in violation of Title 18, United States Code, Section 922(g)(1) set forth in Count 1 of this Information, the defendant, KENNETH MORGAN ADDISON, shall forfeit to the United States pursuant to Title 18, United States Code, Section 924(d) and Title 28, United States Code, Section 2461(c), any firearms, and ammunition involved in the commission of the offense, including, but not limited to:

- M&P, Bodyguard, 380-caliber, obliterated serial number;
- New England Firearms, Pardner Pump, 12- gauge, SN: HW507226;
- New Taurus, PT 1911, .45 caliber, SN: NGW84836;
- LWRC Rifle, unknown model, 5.56 caliber, SN: 4-22336; and
- Ammunition

2. The allegations contained in Count 2 of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

Upon conviction of an offense in violation of Title 21, United States Code, Section 841, the defendant, KENNETH MORGAN ADDISON, shall forfeit to the United States of America any property constituting, or derived from, any proceeds obtained, directly or indirectly, as the result of such offense[s] and any property used, or intended to be used, in any manner or part, to

commit, or to facilitate the commission of, the offense. The property to be forfeited includes, but is not limited to:


- Real property, 15 North Creedmore Way, Anderson, Indiana;
- 2017 Lowe Pontoon Boat SF Series SF212;
- 2017 Karavn Pontoon Trailer;
- \$17,042.00 United States Currency;
- \$25,734.00 United States Currency; and
- \$1,793.00 United States Currency.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).


ZACHARY A. MYERS
United States Attorney



Bradley P. Shepard
Senior Litigation Counsel

9/17/22
DATE

9/14/22
DATE



Nicholas J. Linder
Criminal Chief